

In the Iowa District Court for Polk County

State of Iowa, <i>Plaintiff,</i> v. Robert L. Watson, <i>Defendant.</i>	Agency Case No.: DM18-25154 Agency: Des Moines Police Department County Attorney Preliminary Complaint Review
---	--

COMES NOW the undersigned Assistant Polk County Attorney and states as follows:

I have read and reviewed the attached complaint and affidavit. I:

[X] **Approve** the charge as PURCHASE/POSSESS DEPICTION OF MINOR IN SEX ACT 2ND/SUB OFF—Class D Felony—in violation of Iowa Code Section 728.12(3) and ask the court to find probable cause for this charge.

[X] Request that the Court enter the attached *Arrest Warrant*.

With regard to a bond amount, the State requests that:

[X] The State requests that the Court enter a *No Contact Order at Initial Appearance*.

[X] The State requests defendant be held without bond until initial appearance, so a *No Contact Order* may be entered.

WHEREFORE the State respectfully requests the Court find probable cause and allow the case to proceed under the circumstances set out above.

Respectfully submitted,
JOHN P. SARCONI by:

/s/ Jeff Noble
Assistant Polk County Attorney
Polk County Attorney's Office
222 Fifth Avenue, Des Moines, IA
(515) 286-3737
ctyatty@polkcountyiowa.gov

IN THE IOWA DISTRICT COURT IN AND FOR
POLK COUNTY

This Complaint and Affidavit is to be:

- ☐ Filed with Court Clerk (cc: CA)
- ☒ Submitted to County Attorney
- ☐ Filed with JCO - Defendant is a Juvenile

Agency Case Number: **20180025154**

Arrest Date: _____

THE STATE OF IOWA

VS.

OFFENDER

Last WATSON		First ROBERT		Middle LEO		Suffix	
Address [REDACTED]				City DES MOINES		State IA	Zip Code [REDACTED]
DL# 2	State IA	DL Class D	DL Endorsements 2, L		DL Restrictions J,F,G		
Date of Birth [REDACTED]		Gender MALE	Race WHITE - W		Ethnicity NOT OF HISPANIC ORIGIN - N		
Height 5' 08"		Weight 285 LBS	Eye Color BLACK - BLK		Hair Color BROWN - BRO		

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 728.12(3)	Crime Description PURCHASE/POSSESS DEPICTION OF MINOR IN SEX ACT 2ND/SU		Speed	in	Zone
Class FELD			Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>	Other <input type="checkbox"/>		
Location Type [REDACTED]								
Literal Description [REDACTED]								
Address [REDACTED]				City DES MOINES		State IA	Zip Code 50315	
Is Date and Time of Incident Known? YES		Incident Date or Low Range 08/11/2018		Upper Date Range		Incident Time or Low Range 11:19		Upper Time Range

STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY	<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed On or about the above stated date and time, the Defendant did knowingly purchase or possess a negative, slide, book, magazine or other print or visual medium depicting, a minor, engaged in a prohibited sexual act or simulation thereof by a person previously convicted of or having received a deferred judgment for this offense
--

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last	First SOCIETY	Middle	Suffix
Business/Organization/State/County/Municipality Name			
Address		City	State Zip

AFFIDAVIT

STATE OF IOWA,

POLK COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

Charge approved by Polk County Attorney- Kevin Hathaway. Charge 2 of 10. Image File Name: 0000004_Carved.jpeg. This image depicts the exposed nude chest and vaginal area of a minor female.

On 11 August 2018 Robert L. Watson brought his personal lap top computer to BestBuy because he had spilled gravy on the keyboard rendering this device unusable. Robert purchased a new lap top computer and paid an additional fee to have the files on his used gravy covered computer transferred to his newly purchased computer. During this file transfer process employees at BestBuy "Geek Squad" observed multiple images being transferred that they believed contained child pornography. Once this transfer was complete both computers were collected by Des Moines Police as evidence.

During an interview with Robert regarding illegal content on his computer, Robert admitted that the lap top is solely his and he is the only user of this device, also the computer is password protected. Robert was able to describe several images that Detectives would find on his computer, and added he believes the pictures are of 4 and 5 year olds that Robert felt were about to have sex. Robert advised he downloaded the images because he wanted to tell other people about them. Robert also admitted to saving the images under file names that include; "13 year old" and "14 year old's." The single images listed in this criminal charge was located during a forensic computer download completed by Internet Crimes Against Children (ICAC).



LANCASTER, JAKE

5074

Signature of Complainant or Officer, Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated

02 - CAUGHT IN ACT, 03 - ADMISSION/STATEMENTS, 07 - IDENTIFIED BY WITNESSES, 08 - CRIME OBSERVED BY OFFICERS, 09 - NEAR SCENE OF CRIME, 14 - OTHER PHYSICAL EVIDENCE

Operating Motor Vehicle in County


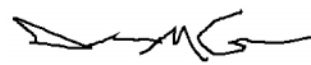
Other Physical Evidence

Attempted To Inflict Injury

ICAC REPORT

STATE OF IOWA,

POLK COUNTY

	Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 04/22/2019	
	Notary Name	DARREN M CORNWELL
	Commission Number	780230
	My Commission Expires	09/13/2019
		Signature of Verifying Party  <input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney